

REMARKS

Applicants have carefully considered the Office Action dated February 14, 2002 and the references cited therein. Applicants respectfully request reexamination and reconsideration of the application.

Claims 1-11, 14, 16-18 stand rejected under 35 USC 102(b) as being anticipated by U.S. 5,690,306, hereafter Roesner. In regards to claim 1, the Examiner alleges that the filler bracket assembly 10 of Roesner discloses a housing (labeled as "C" by the Examiner in Fig. 3 of Roesner) defining an interior cavity housing (labeled as "D" by the Examiner in Fig. 3 of Roesner). Prior to discussing the rejection, Applicants request that the Examiner consider the following remarks.

The subject invention discloses an apparatus for protecting one or more pin connectors on a circuit board. One of the objectives of the apparatus is to protect lubricated pin connectors from airborne contaminants, such as dust, dirt and lint (subject application, paragraph 04). Accordingly, the pin connector of the present invention defines a cavity which substantially surrounds one or more pin connectors when positioned adjacent the surface of a circuit board to which the pin connectors are mounted. In this manner, the lubricated tips of the pin connectors are mechanically isolated from airborne contaminants (subject application, paragraphs 18 and 25). Conversely, the apparatus disclosed in Roesner is a filler bracket assembly for covering an opening in a card cage. The apparatus disclosed in Roesner is not intended to mechanically isolate a component, but merely to cover an aperture. The shape of the filler bracket assembly 10 of Roesner is substantially different than that of pin cover 10 of the subject invention. Specifically, the alleged cavity D identified by the Examiner would not be capable of mechanically isolating any element disposed therein since it is opened on three sides. Conversely, the pin connector of the subject invention when properly attached to a circuit board containing one or more pin connectors mechanically isolates the pin connectors disposed therein from most airborne contaminants exterior to the apparatus.

To further highlight this aspect of the invention, claim 1 has been amended to now recite an apparatus comprising "a housing defining an interior cavity *sized to*

surround at least one pin connector" (claim 1, lines 3-4). The filler bracket assembly 10 of Roesner does not define an interior cavity sized to surround a pin connector. As noted previously, the alleged interior cavity D of Roesner is open on three sides and therefor is not sized to surround or mechanically isolate a component disposed within the such interior cavity. Accordingly, Applicants respectfully assert that Roesner does not disclose, suggest or provide motivation for the subject matter of claim 1. In light of the above, Applicants respectfully assert that claim 1 and its respective dependent claims are not anticipated by or obvious in light of Roesner.

In addition, regarding the rejections of claims 2-3, the Examiner has alleged that the interior cavity D of filler bracket assembly 10 of Roesner is partitioned into a plurality of cavities 12. Applicants respectfully traverse such rejection in that item 12 of Roesner is a slot in card cage 16 and not even part of the filler bracket assembly 10. Applicants respectfully assert that if the Examiner has made an analogy of the part labeled D as the "interior cavity" of the filler bracket assembly 10, he/she cannot redefine such term with a different interpretation to meet the limitations recited in claim 2-3. Slots 12 are not cavities and are further not part the interior cavity D which the Examiner has defined and used as a basis for the rejection.

Regarding the rejection of claims 14, that claim has now been amended to recite an apparatus comprising "a housing *means for* defining an interior cavity and for receiving at least one pin connector" (claim 14, lines 3-4). Such limitation complies with 35 U.S.C. §112, paragraph 6. The Examiner's assertion of *Ex parte Masham* is not proper for such limitation form. Applicants respectfully assert that Roesner does not disclose, suggest or provide motivation for a protective cover having a housing means for defining an interior cavity and for receiving at least one pin connector into the cavity thereof. Accordingly, Applicants respectfully assert that claim 14 and its respective dependent claims are not anticipated by or obvious in light of Roesner.

Applicants respectfully traverse the Examiner's rejection of claim 18 under 35 U.S.C. §102(b) as being anticipated by Roesner. Claims 18-20 recite method claims. In setting forth the rejection, the Examiner has cited filler bracket assembly 10 of Roesner, including the cavity D and aperture A, as labeled by the Examiner, as disclosing the limitation of claims 18 as well as its respective dependent claims. The

Examiner has further cited *Ex parte Masham*. Applicants respectfully assert that the Examiner's citation of *Ex parte Masham* is improper. Specifically, to anticipate a claim, a reference must teach every element of the claim (MPEP Section 2131). A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. V. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Claim 18, as filed, specifically recites a method including "removably securing the protective cover adjacent the circuit board so that the pin connector is disposed within the interior cavity of the protective cover" (claim 18, lines 9-10). The Examiner has failed to indicate where Roesner discloses, suggests or provides motivation for the limitation of securing a protective cover adjacent a circuit board so that a pin connector is disposed within the interior cavity of the protective cover. As stated previously, the filler bracket assembly 10 of Roesner is not intended to mechanically isolate component, but merely to cover an aperture. In addition, filler bracket assembly 10 of Roesner is secured to a card cage 16 of a chassis, and is not intended to be secured adjacent a circuit board so that a pin connector may be disposed in interior of alleged cavity D thereof. Accordingly, Applicant respectfully assert that claim 18, as filed, is not anticipated or obvious in light of Roesner.

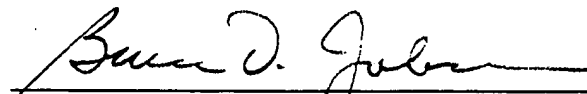
New claims 21-22 have been added and depend from claims 1 and 14, respectively. Claim 21 recites a combination of "a pin connector disposed within the interior cavity of the housing." Similarly, claim 22 recites a combination of "a pin connector disposed within the interior cavity of the housing means." Applicants respectfully assert that Roesner does not disclose, suggest or provide motivation for the subject matter of either of these claims.

Applicants further traverse any rejections of the claims not specifically discussed herein for at least the same or similar as set forth above.

Applicants believe the claims are in allowable condition. A notice of allowance for this application is solicited earnestly. If the Examiner has any further questions regarding this amendment, he/she is invited to call Applicant's attorney at the number

listed below. The Examiner is hereby authorized to charge any fees or credit any balances under 37 CFR §1.17, and 1.16 to Deposit Account No. 02-3038.

Respectfully submitted,



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Version Marked to Show Changes

1. An apparatus for protecting one or more pin connectors on a circuit board comprising:
 - (a) a housing defining an interior cavity [for receiving] sized to surround at least one pin connector; and
 - (b) a mechanism for removably securing the housing over the pin connector.

14. An apparatus for protecting one or more electrical pin connectors on a circuit board comprising:
 - (a) a housing means for defining an interior cavity and for receiving at least one pin connector;
 - (b) a mechanism for removably securing the housing means over the pin connector; and
 - (c) a mechanism for aligning the interior cavity of the housing means with the pin connector.